

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

GLORIA PARKS
38012 East Antisdale Road
South Euclid, Ohio 44118

Plaintiff,

v.

UNIVERSITY HOSPITALS HEALTH
SYSTEM, INC.

c/o Janet Miller, Statutory Agent.
10524 Euclid Avenue, Suite 1100
Cleveland, Ohio 44106

Defendant.

Case No.

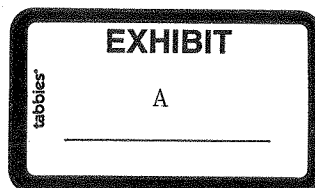
Judge

COMPLAINT WITH FIRST SET OF
INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS
PROPOUNDED TO DEFENDANT
ATTACHED

JURY TRIAL REQUESTED

THE PARTIES

1. Plaintiff Gloria Parks is a citizen of the State of Ohio and resides in South Euclid, Ohio, in the County of Cuyahoga.
2. Defendant University Hospitals Health System, Inc. ("UHHS") is an Ohio Corporation with its principal place of business in Cleveland, Cuyahoga County, Ohio.
3. Defendant is an "Employer" within the meaning of Ohio Revised Code Section 4112.01(A)(2) and/or is a "Person" within the meaning of Section 4112.01(A)(1) of the Ohio Revised Code.



FIRST CAUSE OF ACTION

4. Plaintiff incorporates by reference Paragraphs 1-3 above as if fully realleged herein.
5. Plaintiff Gloria Parks was born on April 12, 1954, and at all times relevant hereto was over the age of forty (40).
6. Plaintiff was employed by Defendant or Defendant's predecessor starting on or around September 1978 through July 24, 2008.
7. Defendant discriminated against Plaintiff because of her age when it terminated her employment on or about July 24, 2008 and otherwise discriminated against her on the basis of her age with respect to the terms, conditions, and privileges of her employment, in violation of Ohio Revised Code Section 4112.02(A).
8. As a result of Defendant's conduct, Plaintiff has suffered and continues to suffer non-economic and economic injuries, including but not limited to pain and suffering, loss of salary, benefits, and other privileges and conditions of employment, for which Plaintiff is entitled to recover compensatory damages pursuant to Ohio Revised Code Sections 4112.99 and 4112.02(N). All or a portion of Plaintiff's damages are likely to continue indefinitely into the future.
9. Defendant's discriminatory conduct in violating Section 4112.02(A) of the Ohio Revised Code was malicious, willful, wanton, and/or in conscious disregard of Plaintiff's rights under Ohio Revised Code Chapter 4112, rendering Defendant liable for punitive damages and attorneys' fees pursuant to Section 4112.99 of the Ohio Revised Code.

WHEREFORE, Plaintiff states that she seeks an amount in excess of \$25,000.00 to fully, fairly, and justly compensate her for her injury, damage, and loss, and respectfully prays that this Court enter judgment in her favor and award her compensatory damages, consequential damages, incidental damages, punitive damages, all costs and reasonable attorneys' fees, and grant such additional or alternative relief as the Court may determine to be just and equitable.

A TRIAL BY JURY IS REQUESTED.

Respectfully submitted,



Ann-Marie Ahern (0070020)
McCarthy, Lebit, Crystal & Liffman Co., LPA
101 West Prospect Avenue Suite 1800
Cleveland, Ohio 44115
(216) 696-1422 (telephone)
(216) 696-1210 (facsimile)
ama@mccarthylebit.com

Ellen S. Simon (0006739)
Of Counsel
McCarthy, Lebit, Crystal & Liffman Co., LPA
101 West Prospect Avenue Suite 1800
Cleveland, Ohio 44115
(216) 696-1422 (telephone)
(216) 696-1210 (facsimile)

Attorneys for Plaintiff